

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
MIDLAND-ODESSA DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

ANGELA WILLIAMS

Defendant

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CASE NO. 7:18-CR-00037-DC

MOTION TO SUPPRESS UNLAWFUL STOP, DETENTION AND ARREST

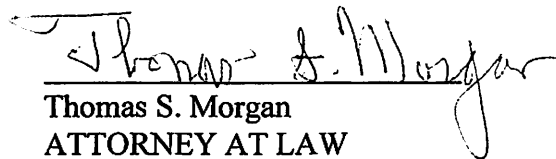
TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW the Defendant, ANGELA WILLIAMS, by and through her attorney of record, Thomas S. Morgan, and files this Motion To Suppress Unlawful Stop, Detention and Arrest, and as grounds for such Motion would respectfully show this Honorable Court as follows:

1. The police officer who stopped the Defendant's motor vehicle did not have probable cause, nor reasonable suspicion based on specific, articulable facts, in the first place, since the Defendant had not committed a traffic violation.

2. Thus, the stop of the vehicle was unlawful under the Fourth Amendment, and the detention and arrest of the Defendant also violated the Fourth Amendment, and the seizure of alleged contraband constitutes fruit of the poisonous tree and should be suppressed under the Fourth Amendment.

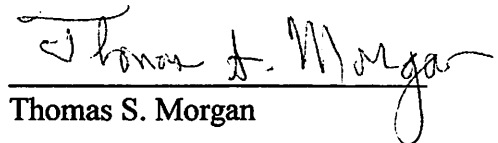
WHEREFORE, the Defendant, ANGELA WILLIAMS, prays that all items seized from the Defendant as a result of an unlawful search, in all things, be suppressed. The Defendant further prays for any and all other relief to which he may be justly entitled.



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STATE BAR I.D. NO. 24051084
ATTORNEY FOR DEFENDANT

CERTIFICATE OF SERVICE

I, Thomas S. Morgan, hereby certify that on the 4th day of April, 2018, a true and correct copy of the foregoing Defendant's Motion To Suppress Unlawful Stop, Detention and Arrest was delivered by facsimile to the United States Attorney, Austin Berry, facsimile number 686-4131.


Thomas S. Morgan